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Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW 1
Washington, DC 20554

Ms. Karen Majcher
Vice President – High Cost Low Income Division
Universal Service Administration Company
2000 L Street NW, Suite 200
Washington, DC 20036

RE: WC Docket No. 10-90
Reporting Requirements FCC Rules 54.313(a)(1) through (6)

July 24, 2012

Dear Secretary Dortch and Ms. Majcher:

On June 27th, Richmond Telephone Company (“RTC”) filed a certification pursuant to WC Docket No. 10-90 as specified in the Public Notice released May 8, 2012 (DA 12-729). Subsequent to that filing, RTC became aware that it had inadvertently checked off “not applicable” to § 54.313(a)(2) through 54.313(a)(4) rather than stating that, while Massachusetts does require reporting of these items, RTC had none to report in the 2011 calendar year. Additionally, the state has asked that the Company affirms that it does not have a 5-year plan. RTC provides here a revised certification regarding its compliance with 54.313(a)(1) through (6).

If you have any questions, please contact me at 770-649-1886.

Sincerely,

A handwritten signature in black ink that reads "Eileen Bodamer". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Eileen Bodamer, Consultant to Richmond Telephone Company

Cc: Massachusetts Department of Telecommunications and Cable

**Annual Reporting Requirements pursuant to § 54.313(a)(2)-(6) and (h)
WC Docket No. 10-90**

§ 54.313(a)(1) – Five-Year Service Quality Improvement Plan

My Company has been designated as an ETC by the State Commission. The state of Massachusetts has asked us to indicate in this ETC certification, whether or not a five-year quality improvement plan has been implemented. My Company does not have a five year quality improvement plan. Hence, in accordance with the Wireline Competition Bureau's Clarification Order in DA 12-147, issued on February 3rd, 2012, paragraph 7, this provision's requirement to submit a progress report does not apply for this filing period.

§ 54.313(a)(2) – Outage reporting

My company did not have any outages in 2011.

§ 54.313(a)(3) – Unfulfilled service requests

My company had no unfilled service requests in 2011.

§ 54.313(a)(4) – Customer complaints per 1000 connections

My company received no complaints in 2011.

§ 54.313(a)(5) – Service quality standards and consumer protection rules

I certify that my company is in compliance with applicable service quality standards and consumer protection rules.


§ 54.313(a)(6) – Ability to function in emergency situations

I certify that my company can function in emergency situations as set forth in 47 CFR §54.202(a)(2). Specifically, my company has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

I am authorized to make this certification on behalf of the company named above and, to the best of my knowledge the information reported on this form is accurate. This certification is for the study area(s) listed below:

Massachusetts	Richmond Telephone Company	Study Area Code: 110037
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Signed,



Scott Gilbert
Chief Operating Officer

Date: July 24, 2012

1416 State Road
Richmond, MA 01254